

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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Kevin Rocheville

v.

Thomas Goulden,  
Matthew Keenlside,  
Allison Caprigno, and  
Town of Pelham, NH

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Civil Action No. 19-CV-01169-AJ

**AFFIDAVIT OF MATTHEW KEENLSIDE**

NOW COMES Matthew Keenlside being duly sworn on oath, depose and state as follows:

1. I am over the age of 18 and am of sound mind.
2. I am a military veteran, having served in the Army National Guard from 2004 to 2013, including as a helicopter pilot.
3. I was also hired by the Town of Pelham as a full-time police officer in 2004 and attended the New Hampshire Police Academy the following year.
4. I have maintained my full-time employment with the Pelham Police Department ever since. I am now a Sergeant in the Department.
5. I am familiar with the Department's SOPs, which include requirements that arrests be made only upon probable cause.
6. I am also familiar with the Department's police cruiser cameras ("dash-cams") and video monitoring of public areas of the police station, including the lobby area. Such video is retained for a period of time during which it can be reviewed and/or preserved.
7. I did not direct the investigation into Plaintiff Keven Rocheville, nor the execution of a search warrant at his home, his arrest or prosecution.

8. I did not enter into any agreement, express or implied, with Thomas Goulden, Allison Caprigno, or any other person to improperly investigate, arrest or otherwise harass Mr. Rocheville.

9. On one occasion I was present when Mr. Rocheville came to the Police Station, I believe for the purposes of paying veterinarian bills or other fees related to certain dogs related to his criminal charges. I did not have any physical contact or swear at him during this encounter, or ever.

10. The lobby area is under video surveillance. Had any such allegation been timely raised, the Department would have had an opportunity to disprove it through review of the video.  
FURTHER THE AFFIANT SAYETH NOT.

Dated: July 21<sup>st</sup>, 2021

/s/ Matthew Keenlside  
Matthew Keenlside

STATE OF NEW HAMPSHIRE  
COUNTY OF

Subscribed and sworn to before me this 21<sup>st</sup> day of July, 2021.

/s/ Brenda M. Rizzo  
~~Notary Public~~ Justice of the Peace  
Commission expires: 12/19/2023